

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENWOOD DIVISION

UNITED STATES OF AMERICA,	)	CR. NO. 8:18CR480
	)	
vs.	)	MOTION TO SEAL DOCUMENT
	)	
BRANDON CORY LECROY	)	
	)	

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Now comes the Defendant, Brandon Cory Lecroy (Lecroy), by and through his attorney, and respectfully moves this court for permission to file under seal the Defendant's Sentencing Memorandum and Motion for a Downward Departure or Variance, pursuant to Local Crim. Rule 49.01 (D.S.C.).

The District Court "has supervisory power over its own records and may, in its discretion, seal documents if the public's right of access is outweighed by competing interests." *In re Knight Pub. Co.*, 743 F.2d 231, 235 (4th Cir. 1984). In this case, sealing is necessary there is an "Order Regulating the Dissemination of Discovery" in effect, and the Defendant's Sentencing Memorandum and Motion for a Downward Departure or Variance contains a detailed summary of the contents of this discovery. *See* ECF #23. Additionally, the document that the Defendant seeks to seal contains personal and confidential information about the Defendant that may, if disclosed to the public, violate the defendant's privacy rights. Defense counsel is unaware of any alternatives to sealing that would afford adequate protection. Furthermore, the document that the Defendant seeks to seal does not

regard any important historical event, nor would it tend to be sought by the public for any proper purpose beyond the boundaries of the instant case.

Defense counsel has consulted with Assistant United States Attorney Bill Watkins, who has no objection to the Defendant's request to seal this document.

Accordingly, the Defendant respectfully requests this court to grant permission to file under seal the Defendant's Sentencing Memorandum and Motion for a Downward Departure or Variance.

Respectfully submitted,  
FEDERAL PUBLIC DEFENDER  
Attorney for the Defendant

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Greenville, South Carolina